

## Overview

*The Firearms Licensing Authorised Professional Practise (APP) will confirm that Chief Constables should develop a Strategic Demand Assessment (SDA). This ensures their force has the appropriate capacity and capability to meet firearms licensing-related demand.*

*The SDA should be undertaken against the underpinning aims and objectives:*

- *Prevent foreseeable or avoidable harm.*
- *Manage risk and act decisively if risk is identified.*
- *Be proportionate and timely.*
- *Provide a fair, rigorous, transparent and consistent service to the public.*

*The SDA should include:*

- *Identifying the demand for firearms licensing capacity and capability. This would include business as usual (for example, applications), anticipated renewals and ongoing suitability assessments for all certificate holders.*
- *Identifying the way this demand will be effectively managed, including the people, places, equipment and training required.*
- *Identifying and assessing the risks to capability and capacity.*
- *Outlining the plans to manage those risks.*
- *The SDA should be reviewed annually. The review should include input from the firearms licensing department. There may also be a need for support from other parts of the organisation (for example, performance analysts).*

*The Chief Constable should approve the SDA, or sign-off should be delegated by them to a senior member of staff such as the strategic lead for firearms licensing.*

*Results of the SDA should be forwarded to the NPCC lead for Firearms Licensing. This enables the national policing lead to assess the level of national demand and capacity, as well as having oversight of challenges in the system. The portfolio lead and supporting working group (FELWG) can advise and facilitate discussion and action for forces who identify problems because of the SDA.*

*Forces should demonstrate trustworthiness by being open and honest, such as making documents such as the strategic demand assessment publicly available.*

## Devon & Cornwall Police Strategic Demand Assessment 2025

### Executive Summary

The Firearms and Explosives Licensing Unit (FELU) strategy, to deliver a safe, efficient and sustainable licensing service continues to provide a solid basis from which to operate.

The department has cleared the backlog of applications from previous years and is providing a broadly timely service to customers, at the time of writing 81% of work is being processed within 112 days. Pressure remains, 2025/26 sees above average levels of renewals requiring bolstering of the team and a focus on efficiency and the triage of work to ensure we provide the best service possible.

The department has pockets of older case work, e.g. suitability reviews, some reach back into 2024 however these are known in terms of detail and an area of focus. Performance overall is good, but sensitive; 2025 and into 2026 will focus on consolidating change and strengthening processes, including continuing to embed a 112 day service level (for non-complex work) alongside recent changes to Statutory Guidance, to continue to deliver a sustainable and safe licensing service.

Change has been a constant in the department, internally from improvement work since 2021 plus the (successful) introduction of a new IT system. Externally the department is required to submit returns, adopt to licensing updates (August Statutory Guidance updates in particular), update policy, practice, work through recruitment challenges – there is a significant amount of work which is, as with other departments and the public sector generally, placing strain on governance and requiring management team focus beyond delivering the core service. The capacity and capability required to manage this is limited, not least with the natural ending of project resource funding. This is managed through prioritisation, maintaining a healthy risk register and having a clear tactical plan; beyond safety and core customer need this is, however, one of the main emerging challenges as we progress into the latter part of 2025 into 2026.

Finally, our relationship with partners and customers remains strong. This is an area the department we will ensure is refreshed and healthy, in the following months FELU intend to review its customer service approach and ensure we remove as many pain points for certificate holder as possible. In September our independent committee will meet and we continue to work positively with colleagues in the Office of the Police and Crime Commissioner to introduce new approaches and systems, such as receiving funding for new automation that will seek to improve the customer experience. The publication of this report, plus regular publication of performance data on our website demonstrates the commitment to transparency and maintaining healthy and appropriate relationships as a licensing authority with certificate holders and stakeholders.



Rob Curtis  
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Operational Lead



Joe Mathews  
Superintendent FELU  
Tactical Lead



Nikki Leaper  
Assistant Chief Constable  
Strategic Lead

## Analysis of Current Performance

*Approved Professional Practices asks us to consider:*

*Referencing the statistical information above and your quarterly data performance submissions, Firearms Licensing Managers are encouraged to reflect on 2023, which should include:*

- The average time in months to manage grant and renewal applications, commenting on the differences between those that have been more straight forward as opposed to complex suitability concerns.*
- Any challenges or successes you have had in managing demand.*

Until December 2024 FELU had been operating under special conditions, with a focus on working through large numbers of legacy (backlogged) cases and clearing down the use of temporary permits. This has been completed and is now focussed exclusively on business-as-usual work.

This represents excellent progress; this achievement allows the department to move forward culturally as well as from a performance perspective. The department no longer holds backlogs nor has significant delays. This statement comes with an obvious need to be cautious, there are definite threats to this stable performance base, however at the start of 2025 this was something to celebrate.

The threat to workload and the department's ability to service need within a reasonable time comes from renewals. Each certificate, with FELU managing approximately 37,000 certificates in total, renews every 5 years. However, this is not spread evenly and in 2025 and 2026 we see large spikes (for the first half of 2025 this was a sustained +27% to average). This challenge was identified in advance as the unit mapped out its workload and has made use of Operation Forestry to respond, a previously utilised methodology whereby police officers (who, in the main are restricted from front line duties) are brought into FELU to make use of their skills to assess and process grants, or other work as required. We are in our third incarnation of this operation, and it is clear this will need to continue. A fresh aspect of staffing that is emerging at the time of writing relates to staff mix; improved demand modelling is tending to demonstrate the need to increase the cadre of Firearms Enquiry Officers – this is early work and in the same modelling it is suggesting the total staffing of the department is sufficient, but the need for particular roles and mix of staff is the medium to long term challenge. This is early work, and thus further comment and detail will develop over the coming weeks and months.

Beyond renewals customer need remains relatively stable over the longer term, the government's increase in fee has not had a major impact albeit we saw a spike in grant applications which has reverberated through 2025. It is anticipated a level of attrition will take place, but this is not yet clear and will be difficult to identify against the background noise of a peak of above average renewals. Professional judgement, and retaining a conservative outlook, suggests planning to a static base (an equal number of new customers vs. those choosing not to renew) is a wise approach.

A new feature to workload prediction and understanding resourcing requirement, and a consequence of the fee increase, is the emergence of a national performance framework and, essentially, a target. The rudimentary framework – which will improve and expand over time – measures forces on number of certificate holders, temporary permits (TP) and, importantly, how much non-complex work is delivered within a 4 month window.

DCP FELU has taken this latter target and refined to a 112 day commitment (16 weeks, 4 x 4 week 'months') to complete all non-complex work and are embedding this in our teams, processes and performance products. The first release of this data identified DCP approximately mid-table nationally. At the time of writing, over the previous 12 rolling months we have processed 81% of work within the 112 day window. The suggested ideal is 80%+.

This welcome focus of the 4 month/112 day target moves us neatly and appropriately away from simple focus on volume to a more refined focus of timeliness and people (customers). Ensuring work is assessed not by the numbers in the system but the time in which FELU completes (balanced, as always, against safety).

Whilst the bulk of work within the department consists of grants and renewals the unit is responsible for over 35 other related processes and flows of work, from volume transactions such as changes of address or firearm transfers, through to managing holders of explosives, firearms dealers and clubs with hundreds of members. Within this space we see spikes of customer need which will not appear in any particularly reported figures, for example: The International Precision Rifle Federation (IPRF) World Championships took place at the West Midlands Shooting Centre in the town of Market Drayton in August 2025. Over 200 competitors from abroad were required to apply for a visitors permit to bring their firearms into the UK. Due to the peculiarities of legislation and location of key people those applications were processed by DCP.

An area of focus for customers and challenge in terms of requiring high level of staff input and detailed decision making relates to our continuous monitoring processes – the heart of our safety management system. Intelligence and correspondence flows into a central team, the Continuous Assessment Team (CAT) where decisions on revocation, investigation prosecution and suitability reviews are made. Complexity and volume provide challenge, in May and June the CAT assessed and processed over 2,600 individual pieces of intelligence, logs and other entities relating to firearm certificate holders. Within the same arena Crown Court appeals also provide requirement for specialist skill, capacity and capability. In conjunction with Force Legal there are 29 appeals pending for hearings in Crown Court.

Performance is impacted by several internal and external factors. Already described is the need to maintain a focus on the mix, not simply the quantity of colleagues, the department is continuing to refine triage processes (so move low risk applications through quickly) and we have seen impactive levels of turnover and absence, within the Firearms Enquiry Officer team. This is being actively managed and is supported by enhanced operational governance, for example each week supervisors and managers meet three times at the start, middle and end to distribute and monitor customer need. This level of scrutiny is important, but it remains a febrile performance environment requiring consistent pressure to maintain throughput within the 112 days.

## Future Demand and Plans

*Approved Professional Practice asks us to consider:*

*Giving consideration to the medium term (1 – 4 Years), what changes to demand do you expect to see in your force area? This is to include changes in volume and complexity.*

*Also, Firearms Licensing Manager to outline how they will effectively manage future demand, which should include:*

- *Staff performance and wellbeing*
- *Location, equipment and training*
- *Identification and assessment of risks to capability and capacity*
- *Outlining the plans to manage those risks and how these will be monitored*

*Finally, please consider and estimate the extent of future demand that you expect to be met having made the changes described above. It is requested that you confirm any demand that you expect to be unmet and what the consequences of not achieving this are likely to be (i.e. how you may manage risks such as these).*

It is possible to project the demand in terms of renewals with anything between 400 and over 1,000 being due in any given month (the long term average being 454). Because of previous legislative changes which have caused some due dates to 'cluster', demand is not spread uniformly, with some years and months likely to experience far more demand than others. 2025 and early 2026 will see heavier than normal demand. The heavy demand then returns in late 2028 / early 2029.

Chart 1 below shows the expected renewal throughput numbers against an ideal average (the number of renewals expected over a five year cycle):

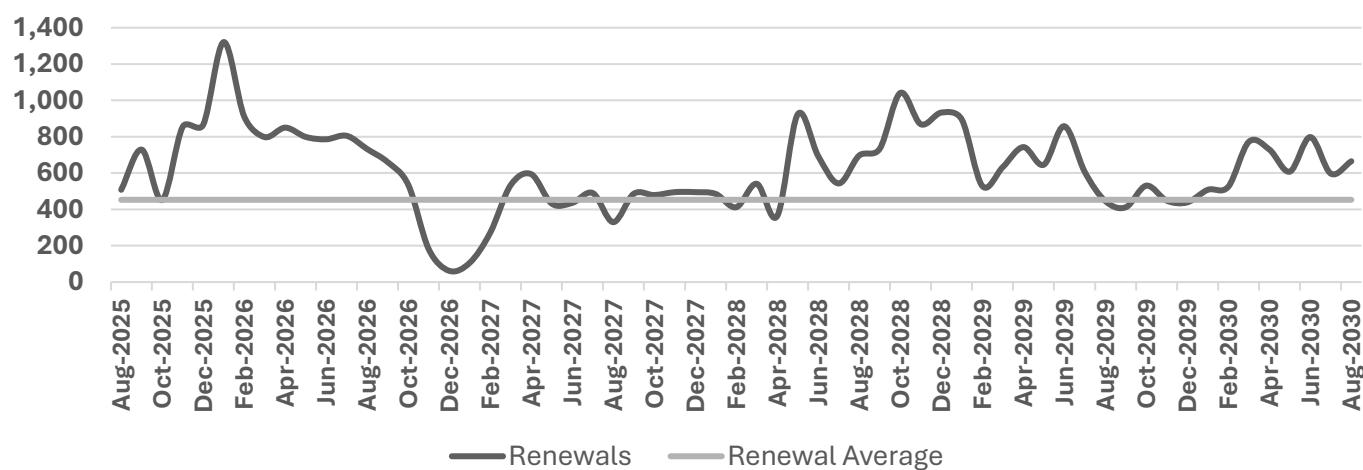


Chart 2 shows the same renewal data as a % of average demand with some key peak highlighted, the static line represents the average (100%/453 renewals per month):

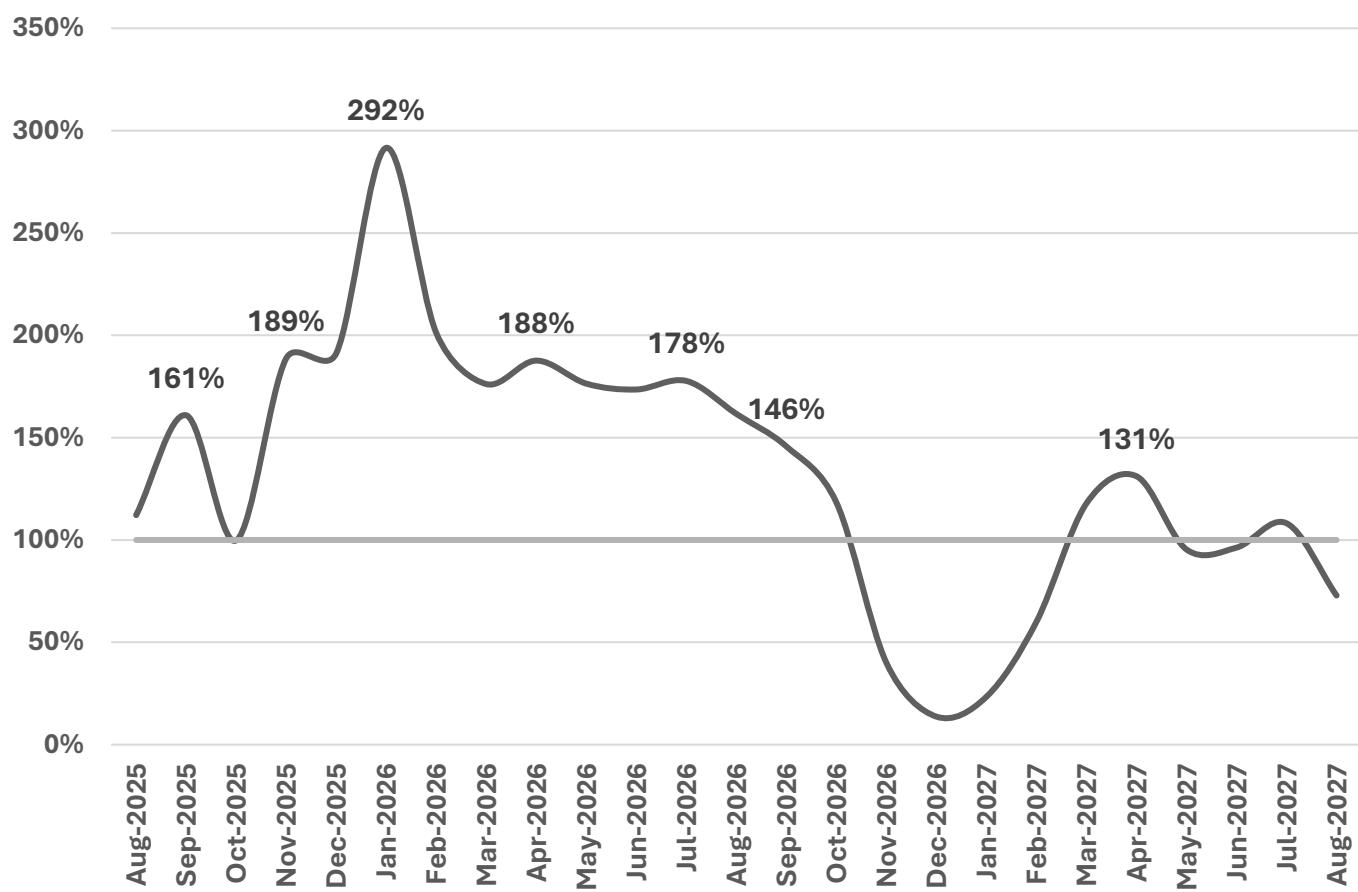
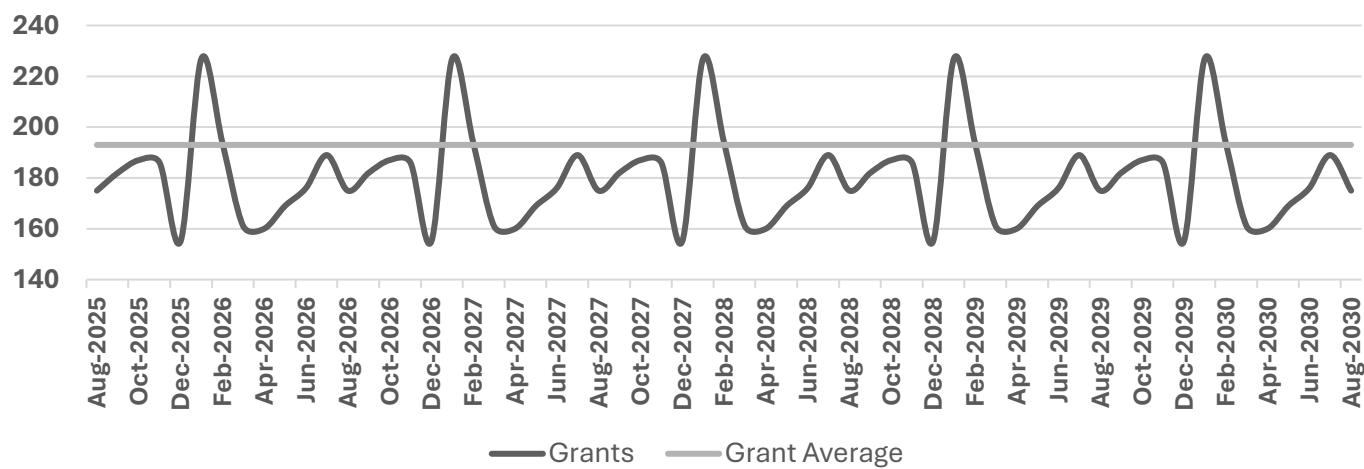
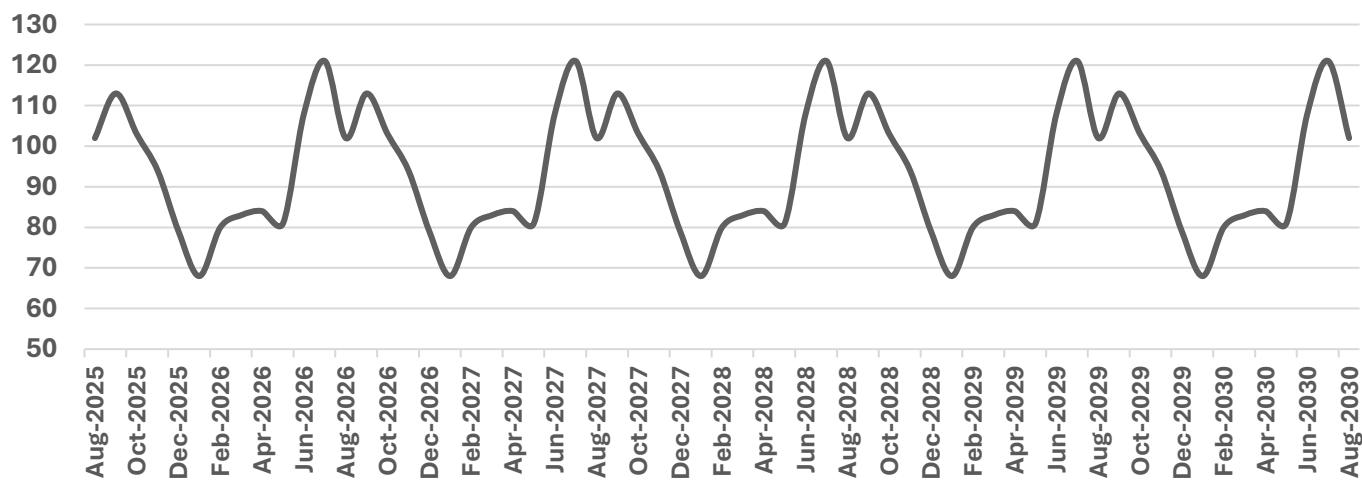


Chart 3 below shows the same for grant applications, grant data is a prediction based on averages from previous years as is the average line. This chart shows the next five years, albeit data repeats:



Finally, *Chart 3* displays 'other' NFLMS transaction prediction, with no average and noting this is not the entirety of work within the department, there remain ~30 other processes not modelled here. Further work is required to refine data prediction.



The FELU strategy of Safe, Efficient and Sustainable remains the focus overall however in 2025 the department will focus heavily on sustainability, the third element of the strategy. Previous improvement has provided an ability to meet need and, at the time of writing, the department is maintaining a broadly timely performance base however levels of renewals and grants are rising and IT change, policy and processes are new and liable to slip if not cemented. The critical issue of above average renewals, plus continuing increases in the volume and complexity of intelligence, log, suitability reviews and appeals present challenge.

Plans are in place to monitor and maintain pressure on ensuring performance. The bullet points below represent a selection of key pieces of work – further detail is contained in the FELU Tactical Plan held internally:

- **Renewals** – renewals will be tackled primarily through prioritisation, improved triage and where necessary in heavier months and the use of Operation Forestry staff (police officers). This will predominantly make use of officers restricted from front line duties. Tipping points and a new and embedded performance management regime is in place to monitor performance levels.
- **Suitability Reviews** – the management team, through the Firearms Licensing Managers (FLMs) will work to reduce the number of Suitability Reviews as part of their BAU workload. The department has, in addition, identified an experienced sergeant who will be able to act temporarily as an FLM to introduce some additional capacity to both allow current FLMs to work through the improvement activity outlined here, plus focus on reducing suitability review case load.
- **Cementing Policy & Working Practice** – policy and practice within the department has evolved rapidly and is continuing to do so, in particular with refreshed 2025 Statutory Guidance; much is related to safety however a fair proportion is associated with efficiency and throughput, for example 8 week workload review

cycles, 14 and 28 day deadline application for customer correspondence. This policy and practice is contained in differing areas and is difficult to access, monitor and maintain thus resource has been assigned the task to consolidate, review and promulgate a refreshed single source of policy.

- **New Robotic Process Automation (RPA)** – FELU has benefited greatly in terms of automation saving hours of colleague time per day and improving the service to customers. There are additional processes that can be automated, particularly the smaller high volume transactions. Funding has been provided following the fee increase to invest in RPA to manage transfers, document uploading and the updating of customers.
- **Pre-Recruitment** – From the same funding stream identified above the department is aggressively recruiting into posts which are anticipated to become vacant. This *pre-recruitment* is intended to reduce the time the team is without an individual. This, alongside a proactive approach to helping manage the welfare and attendance of colleagues is intended to stabilise the challenging recruitment environment the department has faced recently.
- **Embedding 112 Day Target** – the target of non-complex work to be completed within 4 months has been translated, refined and introduced to staff. A plan on a page was developed to embed this within the department, both culturally and in terms of the performance management processes and products. This welcome target provides significant opportunity to better describe the business, gives a component of the equation required to evaluate staffing levels and a focus regarding how FELU should perform and operate.
- **Modelling Staff Need** – over the previous 2 years, during the improvement of FELU, staff modelling (understanding how many colleagues are required against customer need) has taken place on a number of occasions. Whilst useful these models have been based on bulk work only, i.e. grants and renewals, and do not represent the department in its steady state. Making use of Niche, the 35+ process monitoring and Qlik this year (2025) will see the production of a stable model that will inform future staff decisions and assist with, if required, an approach to the Executive to shape current numbers. This work has started and early results, as alluded to above, suggest the base number of colleagues will remain stable albeit the mix may need adjustment, this will be refined through 2025.
- **Operation Furtherfield** – this is the name given to the piece of work where, if we are successful at aligning policy and processes effectively, we will seek to even out a level of renewal demand in 2027. 2027 is a year in which FELU expects to see lower level of renewals and an opportunity to even out the demand across the five year cycle through the issuing of free or low cost licenses. As stated this is in an early stage of discussions and it is, as yet, unclear if any legal or procedural elements may usurp the intent. However the team are in active discussions with FELWG and the Home Office and the hope is, for the benefit of certificate holders in the long term, the possibility of evening out renewal demand will materialise as an option.

**Appendix 1 – 2024 and Rolling 12 Month Data**

	Calendar Year 2024			Rolling 12 months to 31 <sup>st</sup> August 2025 (Sept. '24 to Aug. '25 Inclusive)			
	Received	Granted	Refused	Received	Granted	Refused	Ongoing as of 1 <sup>st</sup> September
Shotgun Grants	767	1,097	451	890	709	72	331
Shotgun Renewals	1,770	2,110	191	2,868	2,469	25	786
Shotgun Transfers	Data unavailable at time of writing						
Firearm Grants	534	641	196	644	658	36	201
Firearm Renewals	1,469	1,703	98	1,912	1,663	24	571
Firearm Variations	479	466	6	477	455	2	34
Firearm Transfers	Data unavailable at time of writing						
RFD Grants	8	6	2	11	8	1	1
RFD Renewals	30	26	0	49	44	0	6
RFD Checks	Data unavailable at time of writing						
Club Applications	11	13	No Figure	9	5	No Figure	3
Club Renewals	2	3	No Figure	4	8	No Figure	3
Sec 11(6) Applications	32	32	0	68	68	0	6
Visitor Permits	113	186	1	548	546	2	7
Explosives - Grant	4	No Figure	No Figure	4	No Figure	No Figure	11
Explosives - Renewal	0	No Figure	No Figure	0	No Figure	No Figure	15

### Appendix 1 – 2024 and 12 Month Rolling Data (Continued)

#### Notes & Additional Information

- As of 1st September 2025 the department is reviewing the suitability (because of police involvement or medical information) of 219 certificate holders and is managing 29 appeals.
- Up to the end of 2024 the department managed two separate workflows, called Business As Usual (BAU) and Legacy. The Legacy workload was a distinct group of applications that had been split from the BAU and represented the backlog created from the challenges the department faced in 2021. As a result, and as can be seen in the 2024 figures, we report a much higher number of, for example, renewals being processed than we received. This is a result of specific colleagues clearing the Legacy work in 2024 and it skewing the performance figures – albeit it being a success that this work has been delivered.
- A more refined measure is to reflect work completed in the rolling 12 month period, also represented in the table on the previous page, and noting this is the approach undertaken by the NPCC and used on our website.
- This SDA asks about the possibility of ‘unmet demand’ – it is not anticipated that we will be unable to meet demand albeit the *time* it takes for work to be completed may vary and may exceed the 112 day target. Renewals will be maintained as a priority and, at the time of writing, the department is meeting its obligations regarding 80% of work being contained within 112 days (82% of work as at 31/08/25 is within 112 days). The tension will remain between the ability and time needed for the department to embed change, such as Statutory Guidance 2025, whilst managing throughput and this will be the continued focus through 2025. It is anticipated this tension will be seen in areas such as grant applications at the time of writing 206 grant applications are over 112 days. Whilst this is a figure down from over 300 it continues to be where the pressure will be seen and felt. As a reminder this data is published regularly on the website for interrogation and scrutiny.